

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JERRY MARTINEZ-MARTI,

Defendant.

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Criminal No. 16-CR-30042-MGM

OPPOSITION TO MOTION TO TERMINATE SUPERVISED RELEASE

The United States, by its attorney, Acting United States Attorney William D. Weinreb, opposes the defendant's motion for early termination of his supervised release. Additional supervision is needed in order to reintegrate the defendant into the community and reduce the risk of future criminal conduct because the defendant does not have the income and/or resources to support himself and requires further mental health treatment.

The defendant has not held steady, full-time employment since the beginning of his term of supervised release, maintaining only periodic part-time employment. When the Probation Department has tried to enforce the condition of employment, the defendant has sought out mental health counseling in lieu of employment. After enrolling and receiving treatment, the defendant returned to either not working or maintaining only part-time employment status.

The defendant, without notifying the Probation Department, recently withdrew from a course to obtain a commercial driving license due to a language barrier and inability to read and understand the text books. Once the Probation Department learned the defendant was no longer in school, it again sought to enforce the full-time employment requirement. The defendant responded to the enforcement effort by requesting mental health treatment for social anxiety.

The Probation Department continues to support the defendant's pursuit of mental health treatment. In addition, the Probation Department believes that supervision is required to address

the defendant's difficulties with the English language, which has been an obstacle to employment.

The request for early termination comes at a time when the Probation Department was again attempting to enforce the employment condition, which was met again with a request for mental health treatment in lieu of employment. The defendant recently agreed to make participation in mental health treatment a condition of supervised release. The defendant filed the instant motion to terminate supervision shortly after reaching that agreement with the Probation Department.

For the foregoing reasons, the United States opposes the motion for early termination of supervised release.

Respectfully submitted,

WILLIAM D. WEINREB
Acting United States Attorney

/s/ Karen L. Goodwin
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Certificate of Service

I hereby certify that this document will be hand-delivered this date to the defendant at the scheduled hearing.

By: /s/ Karen L. Goodwin
KAREN L. GOODWIN
Assistant U.S. Attorney

Dated: August 24, 2017